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Special Litigation Counsel for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a
Washington corporation,
Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit
Chapter 7

**NOTICE OF FIRST AND FINAL
CONTINGENCY FEE APPLICATION
OF THE POTOMAC LAW GROUP PLLC
(PERKINS ADVERSARY PROCEEDING)**

Hearing Date:

Date: September 10, 2024

Time: 10:30 a.m., Pacific Time

**Location: 904 West Riverside Ave.
3rd Floor Courtroom
Spokane, WA 99201**

Please take notice that the Potomac Law Group, PLLC (“Applicant”) has filed the *First and Final Contingency Fee Application of the Potomac Law Group PLLC (Perkins Adversary Proceeding)* (the “Application”) requesting payment on a final basis as follows:

Fees:	\$900,000.00
Expense Reimbursement:	\$1,648.15
Total	\$901,648.15

Payment will be made from the \$3 million proceeds of the settlement of the adversary proceeding, *Waldron v. Perkins*, Adv. Proc. No. 20-80031 (“Perkins”

Notice of PLG Final Application
for Payment of Contingency Fee and Expenses - Page | 1

Adversary”). Pursuant to this Court’s Order, dated December 15, 2020 (ECF No. 840), the Trustee retained Applicant to serve as special litigation counsel on a contingency fee basis in the Perkins Adversary. Pursuant to the Order, and subject to this Court’s review and approval, Applicant is entitled to 30% of the \$3 million that Perkins has paid to resolve the Perkins Adversary. The \$900,000 fee amount requested in this Application is 30% of the proceeds of the settlement of the Perkins Adversary.

Applicant has previously received compensation and reimbursements on an interim basis for services performed pursuant to a separate Order employing Applicant as general counsel to the Chapter 7 Trustee with payment at the rate of \$400 per hour. Those payments are:

		Applied For	Awarded
Prior Application #1	Date:	3/10/2021	4/14/2021
	Compensation:	\$30,040.00	\$30,040.00
	Expenses:	\$0	\$0
Prior Application #2	Date:	7/16/2021	8/17/2021
	Compensation:	\$42,680.00	\$42,680.00
	Expenses:	\$0	\$0
Prior Application #3	Date:	4/1/2022	5/3/2022
	Compensation:	\$65,360.00	\$65,360.00
	Expenses:	\$350.00	\$350.00
Prior Application #4	Date:	8/22/2022	9/21/2022
	Compensation:	\$65,320.00	\$65,320.00
	Expenses:	\$31.71	\$31.71
Prior Application #5	Date:	2/2/2023	3/8/2023
	Compensation:	\$74,480.00	\$74,480.00
	Expenses:	\$482.31	\$482.31
Total Prior	Compensation	\$277,880.00	\$277,880.00
	& Expenses:	\$864.02	\$864.02

A hearing will be held on the Application on September 10, 2024 at 10:30 a.m. Pacific Time at the U.S. Bankruptcy Court, Eastern District of Washington located at 904 West Riverside Ave., Third Floor Courtroom, Spokane, WA 99201. If you wish to object to the Application, you must file an objection with the Court and serve it upon undersigned. **The deadline to file an objection is August 22, 2024.** The Court may enter an Order or Orders without further notice unless a written objection is timely served and filed.

Dated: July 26, 2024

POTOMAC LAW GROUP PLLC

By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)
*Attorneys for Mark D. Waldron, Chapter 7
Trustee, Plaintiff*